

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

Appellants:	Fabio CASATI et al.	§	Confirmation No.:	3326
Serial No.:	10/761,642	§	Group Art Unit:	2167
Filed:	01/21/2004	§	Examiner:	S. F. Rayyan
For:	Displaying Metrics From An Alternative Representation Of A Database	§	Docket No.:	200310151-1

**APPEAL BRIEF**

**Mail Stop Appeal Brief – Patents**  
Commissioner for Patents  
PO Box 1450  
Alexandria, VA 22313-1450

Date: August 23, 2007

Sir:

Appellants hereby submit this Appeal Brief in connection with the above-identified application. A Notice of Appeal was electronically filed on June 26, 2007.

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**I. REAL PARTY IN INTEREST**

The real party in interest is the Hewlett-Packard Development Company (HPDC), a Texas Limited Partnership, having its principal place of business in Houston, Texas. HPDC is a wholly owned affiliate of Hewlett-Packard Company (HPC). The Assignment from the inventors to HPDC was recorded on January 21, 2004, at Reel/Frame 014915/0554.

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**II. RELATED APPEALS AND INTERFERENCES**

Appellants are unaware of any related appeals or interferences.

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**III. STATUS OF THE CLAIMS**

Originally filed claims: 1-20.

Claim cancellations: None.

Added claims: None.

Presently pending claims: 1-20.

Presently appealed claims: 1-20.

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**IV. STATUS OF THE AMENDMENTS**

No claims were amended after the final Office action dated April 18, 2007.

**V. SUMMARY OF THE CLAIMED SUBJECT MATTER**

Some computer systems analyze data and generate reports based on the analyzed data. For example, a system may report profits by analyzing revenue and expenditures. A reporting application may be responsible for analyzing relevant data and generating the reports. In some cases, the reports generated by such a system use data collected at multiple levels of the organization. Mappings, data structures, and complex queries may need to be generated and executed by the reporting application to relate and transform the data into user-friendly information. Unfortunately, the performance of such systems may be adversely affected by the generation and execution of such mappings.

Appellants' contribution comprises tools and techniques that allow users to define, compute, analyze and/or monitor business and information technology metrics. Appellants' contribution includes, for example, a definition of generic mapping functions that can be reused for a number of metrics and reports. As a result, different reports can be defined without having to write new code. See e.g., para. [0014] and [0016]

In accordance with the illustrative invention of claim 1, a method comprises selecting, by a user, at least one metric from an alternative representation of a database of existing data. The method further comprises selecting a mapping based on the metric, invoking the mapping to create a search query, invoking an interpreter to execute the search query and return data related to the search query, and displaying the data related to the search query. See e.g., paras. [0017]-[0038]; Figs. 4-5.

In accordance with the illustrative invention of claim 8, a computer-readable medium (Fig. 1, 110) stores a program (Fig. 1, 114) that is executable by a processor (Fig. 1, 108). The program causes the processor to perform a method. The method includes maintaining existing data, storing metrics related to the existing data, selecting a mapping based on at least one metric, using the selected mapping, mapping the existing data to the metrics, and providing access to the existing data by referencing the metrics. See e.g., paras. [0017]-[0038]; Figs. 4-5.

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In accordance with the illustrative invention of claim 12, a system comprises a computer system (Fig. 1, 102) having a central processing unit (Fig. 1, 108), memory (Fig. 1, 110), and a database (Figs. 1 and 2, 104) that stores a previously created data set. The database comprises an alternative representation of the previously created data and an interpreter that executes search queries generated from mappings stored in the alternative representation . See e.g., paras. [0017]-[0038]; Figs. 4-5.

In accordance with the illustrative invention of claim 18, a system comprises a computer system (Fig. 1, 102) having a means for executing programs (Fig. 1, 108) and a means for storing programs (Fig. 1, 110). The means for storing is for storing a reporting application (Fig. 1, 114) executable by the means for executing. Fig. 2. The system also comprises a database (Figs. 1 and 2, 104) coupled to the computer system. The database stores a previously created data set. The database comprises an alternative representation of the previously created data and an interpreter that executes search queries generated from mappings stored in the alternative representation. See e.g., paras. [0017]-[0038]; Figs. 4-5.

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**VI. GROUNDS OF REJECTION TO BE REVIEWED ON APPEAL**

Whether claims 1-9 and 11-20 are anticipated by US Pat Pub. No. 2003/0041044 ("Monestere").

Whether claim 10 is obvious over Monestere in view of U.S. Pat. Pub. No. 2005/0256766 ("Garcia").

**VII. ARGUMENT**

**A. The § 102 Rejections of claims 1-9 and 11-20**

**1. Claims 1-7**

Claim 1 requires “selecting a mapping based on the at least one metric” and “invoking the mapping to create a search query.” Appellants do not find this combination of limitations in the art of record. The Examiner seems to analogize a search criterion and a search query in Monestere to the claimed “metric” and “mapping,” respectively. However, Appellants respectfully submit that the Examiner’s analysis is logically flawed when comparing the teachings of Monestere to claim 1. For example, a search query of Monestere is not selected based on a search criterion, and the search query naturally is not invoked to create the search query, as would be required by claim 1. No other art of record satisfies the deficiencies of Monestere.

For either or both of these reasons, the Examiner has erred in rejecting claim 1. Based on the foregoing, Appellants respectfully submit that the rejections of the claims in this grouping be reversed, and the claims set for issue.

**2. Claims 8-9 and 11**

Claim 8 requires “selecting a mapping based on the at least one metric” and, “using the selected mapping, mapping the existing data to the metrics.” Appellants do not find this combination of limitations in the art of record for much the same reasons articulated above regarding claim 1 and for these reasons, Appellants respectfully submit that the Examiner has erred in rejecting claim 8. Based on the foregoing, Appellants respectfully submit that the rejections of the claims in this grouping be reversed, and the claims set for issue.

**3. Claims 12-17**

Claim 12 requires “an interpreter that executes search queries generated from mappings.” The Examiner seems to indicate that Monestere’s search queries are akin to the claimed “mappings.” If that were a fair assessment of the art, then the claim, when read against Monestere would require executing a search query from a search query, a logically inconsistent result. No other art of record satisfies this deficiency of Monestere.

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Based on the foregoing, Appellants respectfully submit that the rejections of the claims in this grouping be reversed, and the claims set for issue.

**4. Claims 18-20**

Claim 18 requires an “interpreter that executes search queries generated from mappings.” Appellants respectfully submit that the Examiner’s analysis of claim 18 is inconsistent as explained above regarding claim 12.

Based on the foregoing, Appellants respectfully submit that the rejections of the claims in this grouping be reversed, and the claims set for issue.

**B. The § 103 Rejection**

Claim 10 depends from claim 8 and thus inherits the limitations of claim 8. As explained above, Appellants believe that the Examiner erred in rejecting claim 8 over Monestere. Garcia does not satisfy the deficiency of Monestere. Thus, Appellants submit that the Examiner erred in rejecting claim 10 for at least the same reason as claim 8.

**C. Conclusion**

For the reasons stated above, Appellants respectfully submit that the Examiner erred in rejecting all pending claims. It is believed that no extensions of time or fees are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 C.F.R. § 1.136(a), and any fees required (including fees for net addition of claims) are hereby authorized to be charged to Hewlett-Packard Development Company's Deposit Account No. 08-2025.

Respectfully submitted,

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**VIII. CLAIMS APPENDIX**

1. (Previously presented) A processor-based method comprising:  
selecting, by a user, at least one metric from an alternative representation  
of a database of existing data;  
selecting a mapping based on the at least one metric;  
invoking the mapping to create a search query;  
invoking an interpreter to execute the search query and return data related  
to the search query; and  
displaying the data related to the search query.
2. (Original) The method as defined in claim 1 wherein selecting further  
comprises selecting from the alternative representation of the database wherein  
the alternative representation is a reduced version of the existing data.
3. (Previously presented) The method as defined in claim 1 wherein  
selecting further comprises selecting a metric.
4. (Original) The method as defined in claim 1 further comprising:  
generating a request based on the existing data from the request based on  
the at least one metric prior to the invoking; and  
wherein the invoking further comprises invoking the interpreter using the  
request based on the at least one metric.
5. (Original) The method as defined in claim 4 wherein selecting further  
comprises selecting the at least one metric from the alternative representation of  
the database of existing data to create a generic structured query language (SQL)  
request based on the at least one metric.
6. (Original) The method as defined in claim 5 wherein generating further  
comprises generating a specialized SQL request based on the existing data from  
the request based on the at least one metric.

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7. (Original) The method as defined in claim 1 wherein the selecting further comprises selecting at least one metric from the alternative representation of the database of existing data, the alternative representation incorporated with the existing data in the database.
8. (Previously presented) A computer readable medium storing a program that, when executed by a processor of a computer, performs a method comprising:
  - maintaining existing data;
  - storing metrics related to the existing data;
  - selecting a mapping based on at least one metric;
  - using the selected mapping, mapping the existing data to the metrics; and
  - providing access to the existing data by referencing the metrics.
9. (Original) The computer readable medium as defined in claim 8 wherein mapping further comprises mapping the existing data to a set of predefined metrics.
10. (Original) The computer readable medium as defined in claim 9 wherein mapping further comprises utilizing a general mapping table to relate the existing data to the predefined metrics.
11. (Original) The computer readable medium as defined in claim 8 wherein the providing further comprises generating a specific query to the existing data using the metrics.
12. (Original) A system comprising:
  - a computer system having
    - a central processing unit (CPU);
    - a memory coupled to the CPU, the memory storing a reporting application executable by the CPU;

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a database coupled to the computer system, the database storing a previously created data set;  
wherein the database comprises an alternative representation of the previously created data and an interpreter that executes search queries generated from mappings stored in the alternative representation.

13. (Original) The system as defined in claim 12 wherein the database is part of the computer system.

14. (Original) The system as defined in claim 12 wherein the reporting program allows a user to select at least one metric from the alternative representation of the database to create a request based on the at least one metric, and wherein an interpreter of the database modifies the request to pertain to the previously created data.

15. (Previously presented) The system as defined in claim 14 further comprising allowing the user to select a metric.

16. (Original) The system as defined in claim 14 wherein the reporting program allows a user to select at least one metric from the alternative representation of the database to create structured query language (SQL) request based on the at least one metric, and wherein an interpreter of the database replaces labels of the SQL request to pertain to the previously created data.

17. (Original) The system as defined in claim 12 wherein the database comprises a reduced representation as the alternative representation.

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18. (Original) A system comprising:
  - a computer system having
    - a means for executing programs;
    - a means for storing programs coupled to the means for executing, the means for storing a reporting application executable by the means for executing;
    - a database coupled to the computer system, the database storing a previously created data set;
  - wherein the database comprises an alternative representation of the previously created data and an interpreter that executes search queries generated from mappings stored in the alternative representation.
19. (Original) The system as defined in claim 18 wherein the reporting program allows a user to select at least one metric from the alternative representation of the database to create a request based on the at least one metric, and wherein an interpreter of the database modifies the request to pertain to the previously created data.
20. (Previously presented) The system as defined in claim 18 further comprising allowing the user to select a metric.

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**IX. EVIDENCE APPENDIX**

None.

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**X. RELATED PROCEEDINGS APPENDIX**

None.